



HARRIS CORPORATION

November 8, 2010

Via Electronic Filing

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
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Re: Notice of Ex Parte, Docket No. PS 06-229

Dear Ms. Dortch:

Pursuant to 47 C.F.R. § 1.1200, et seq., Harris Corporation (“Harris”) hereby notifies the Federal Communications Commission (“Commission”) of the following ex parte presentation in the above-referenced proceeding. On November 5, 2010, on behalf of Harris, JoAnne Dalton, Tania Hanna, and Evan Morris met with the following members of the Commission’s Public Safety and Homeland Security Bureau: Pat Amodio, Gene Fullano, David Furth, Brian Hurley, Jason Kim, Megan Koster, Jennifer Manner, and Erika Olsen. During the meeting Harris reviewed with members of the Public Safety and Homeland Security Bureau the comments Harris submitted in response to the Commission’s Public Notice seeking comment on additional Petitions for Waiver to deploy 700 MHz public safety broadband networks. Discussion focused on Harris’ recommendations regarding: (1) the scope of network access in the 700 MHz public safety broadband spectrum and (2) geographic coordination and governance issues pertaining to both waiver recipients and network “licensees” under the Commission’s final public safety broadband network rules.

While first responders should remain the primary users and “licensees” of the 700 MHz public safety broadband spectrum, discretion should be provided to the first responder community to determine what other government and quasi-government organizations would advance the mission of public safety and should be permitted to access newly deployed PSBNs on a secondary basis for mission critical communications. Harris believes providing this type of flexibility to 700 MHz public safety broadband “licensees” is consistent with Section 337(f) of the Communications Act of 1934 (“the Act”), as has been previously illustrated in the Commission’s interpretation of Section 337(f) of the Act in both the 700 MHz proceeding and 4.9 GHz proceeding.

In addition, Harris agrees with the Commission that requiring geographic coordination to take place on the state level is the most efficient way to ensure 700 MHz public safety deployments are coordinated under the waiver process, however, jurisdictions smaller than states should continue to be eligible to apply for and be granted waivers for early deployment. Regardless of how the 700 MHz public safety spectrum band is licensed, the Commission must ensure that any rules it adopts provide sufficient levels of operational flexibility in order to account for the unique needs and requirements of individual public safety entities. As a result, the Commission should clarify in its next Waiver Order that the purpose of the geographic coordination process is to ensure interoperability and uniform network governance moving forward and not to restrict non state level waiver entities autonomy with regards to their network use, build-out, and operation. The Commission should also issue a Public Notice seeking comment on the following issues: (1) steps the Commission can take within the geographic coordination process to encourage jurisdictional cooperation when deploying 700 MHz public safety broadband networks and (2) how governance rules, in concert with technical requirements, will most effectively facilitate nationwide interoperability. This inquiry should be conducted in light of both the ongoing waiver process and the Commission’s work to establish final rules for the 700 MHz public safety broadband spectrum.

Respectfully submitted,

 /s/

Evan S. Morris, Esq.
Counsel, Government Relations
Harris Corporation

CC (via electronic mail):

Pat Amodio (Public Safety and Homeland Security Bureau)
Gene Fullano (Associate Chief, Public Safety and Homeland Security Bureau)
David Furth (Deputy Chief, Public Safety and Homeland Security Bureau)
Brian Hurley (Public Safety and Homeland Security Bureau)
Jason Kim (Public Safety and Homeland Security Bureau)
Megan Koster (Public Safety and Homeland Security Bureau)
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